

GREGORY W. SMITH (SBN 134385)
DIANA WANG WELLS (SBN 284215)
LAW OFFICES OF GREGORY W. SMITH, LLP
9100 Wilshire Boulevard, Suite 725E
Beverly Hills, California 90212
Telephone: (310) 777-7894
Telecopier: (310) 777-7895
Email: sfrancia@gwslegal.com

BETH D. CORRIEA (SBN 210455)
THINK LEGAL360, P.C.
407 N. Pacific Coast Highway, Suite 1002
Redondo Beach, California 90277
Telephone: (310) 869-0385
Facsimile: (310) 943-1468
Email: beth@thinklegal360.com

Attorneys for Plaintiff TONI MCBRIDE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LAPD OFFICER TONI MCBRIDE,

Plaintiff,

vs.

CHIEF OF POLICE MICHEL MOORE;
LOS ANGELES POLICE
DEPARTMENT,

Defendants.

**CASE NO. 2:23-CV-02904-RKG-
JPR**

**[PROPOSED] JOINT
STATEMENT OF THE CASE**

Trial: April 2, 2024

///

///

///

///

///

///

1 The parties in the above-entitled action, through their counsel of record, hereby
 2 submit the following Joint Statement of the Case:

3 The Plaintiff, Toni McBride, is a Police Officer that alleges her rights to free
 4 speech were violated when the Chief of Police, Michel Moore, told her to delete her
 5 social media account on Instagram.
 6

7 The Defendants, City of Los Angeles and Michel Moore, allege that Plaintiff
 8 was never told to delete her social media account and that no adverse employment
 9 action was taken against her due to her speech.
 10

11 Dated: March 26, 2024

LAW OFFICES OF GREGORY W. SMITH, LLP
 THINK LEGAL360, P.C.

12 By: /s/ Gregory W. Smith
 13

GREGORY W. SMITH

BETH D. CORRIEA

Attorneys for Plaintiff TONI McBRIDE

14 Dated: March 26, 2024

ANETA FREEMAN, Managing Assistant City
 Attorney

KEIMER E. RAYMOND, Deputy City Attorney

15 By: /s/ Keimer E. Raymond
 16

KEIMER E. RAYMOND

Deputy City Attorney

Attorneys for Defendants, **CITY OF LOS**

ANGELES, CHIEF OF POLICE MICHEL
MOORE

17 In accordance with Local Rule 5-4.3.4, the filer hereby attests that all other
 18 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
 19 content and have authorized the filing.
 20

CERTIFICATE OF SERVICECase Name: ***Officer Toni McBride v. Chief of Police Michel Moore, et al.***Case No.: ***2:23-cv-02904-RKG-JPR***

I am employed by the Law Offices of Gregory W. Smith, LLP in the County of Los Angeles, State of California at whose direction the service was made. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 725E, Beverly Hills, California 90212; my email address is: sfrancia@gwslegal.com.

On the date hereinbelow specified, I served the document, described as set forth below, on the interested parties in this action by electronically serving true copies as follows:

DATE OF SERVICE: March 26, 2024

DOCUMENT SERVED: **[PROPOSED] JOINT STATEMENT OF THE CASE**

PARTIES SERVED: Aneta Barbara Freeman
 Keimer E. Raymond
 City of Los Angeles City Attorney
 Employment Litigation Division
 200 North Main Street Suite 7th Floor
 Los Angeles, CA 90034-1615
aneta.freeman@lacity.org;
Keimer.raymond@lacity.org
Counsel for Defendants Chief of Police Michel Moore, Los Angeles Police Department

XXX (BY CM/ECF NOTICE OF ELECTRONIC FILING):

I electronically filed document(s) with the Clerk of the Court by using the CM/ECF system. Participants in this case who are registered CM/ECF users will be served by the CM/ECF system. Participants in this case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

XXX (FEDERAL) I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on **March 26, 2024**, at Los Angeles, California.

/s/ Selma Francia

Selma Francia